

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL ACTION
	:	
VS.	:	
	:	
BAHAA DAWARA	:	CASE. NO. 414-2019

MOTION FOR DISCOVERY

Comes Now, Bahaa Dawara, appellant, by his attorney, Gerald A. Stein, and moves to for discovery of un-redacted witness statements of civilian witnesses so that counsel for defendant can have access to addresses of witnesses and/or information to aid in locating witnesses in order to prepare for trial, and in support thereof represents:

1. Movant is charged with Arson, and various other related charges.
2. Numerous reports describing witness statements have been provided to the defense, including civilian witnesses. In nearly all instances, civilians addresses, birth dates and other identifying information have been redacted from copies of reports provided to the defense.
3. In order to properly prepare a defense it will be necessary to locate many of the witnesses in order to interview and, if appropriate, subpoena same for trial. Therefore, an order is sought directing the government to provide un-redacted reports of witnesses interviews so that the defense has the ability to locate witnesses for interview purposes.

4. Counsel agrees that the requested material would be utilized in accordance with the previously entered protective order and that the information sought will not be disclosed to anyone other than the defense investigator and co-counsel.

Respectfully submitted,

/s/ Gerald A. Stein

GERALD A. STEIN, ESQUIRE

CERTIFICATION OF SERVICE

Gerald A. Stein, Esquire, hereby certifies that a true and correct copy of the within Notice of Appeal has been served by first class mail on Jeanine Linehan, Esquire, Assistant United States Attorney, 615 Chestnut Street, Suite 1250, Philadelphia, Pennsylvania 19106-4476, Chief Judge Juan Sanchez, Federal Courthouse, 601 Market Street, Philadelphia, PA 19106 and Steven Patrizio, Esquire, Co-counsel, 2 Penn Center, Suite 1205, 1500 JFK Blvd., Philadelphia, PA 19102.

/s/ Gerald A. Stein

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Dated: March 6, 2020